

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN

MARGARET J. LOEWEN, M.D.)
Plaintiff,)
vs.) Civil Action No. 1:10-cv-1284
GRAND RAPIDS MEDICAL) Honorable Gordon J. Quist
EDUCATIONAL PARTNERS, a corporation,) U.S. District Judge
SPECTRUM HEALTH SYSTEM, a corporation,)
TRINITY HEALTH CORPORATION,)
a corporation t/d/b/a SAINT MARY'S HEALTH)
CARE, MICHIGAN STATE UNIVERSITY, a)
corporation, MARC SCHLATTER, an individual)
and JOHN vanSCHAGEN, an individual)
Defendants.)
)

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**MOTION FOR LEAVE TO FILE CONFIDENTIAL
APPENDIX MATERIALS UNDER SEAL**

Defendant Trinity Health Corporation t/d/b/a St. Mary's Health Care, ("St. Mary's"), by and through undersigned counsel, files this Motion For Leave to File Confidential Materials Under Seal, stating as follows:

1. On or about August 2, 2011, the above-captioned parties agreed to a Protective Order (hereinafter "Protective Order"), under which the Parties agreed to designate documents containing personal and/or proprietary information as "confidential."
2. The Protective Order was signed by U.S. Magistrate Judge Ellen S. Carmody on or about August 5, 2011.
3. In response to the Plaintiff's Second Response to Opposition to Trinity Health Corporation and Spectrum Health System's Motion to Dismiss and for Summary Judgment, filed previously, Defendant St. Mary's plans to file a Response with Appendix materials containing documents previously designated by the Parties as "confidential."
4. The "confidential" appendix materials are filed contemporaneously herewith.
5. Western District of Michigan Local Civil Rule 10.6(b) allows for documents that are of a proprietary and/or personal nature to be filed under seal, and the Parties have agreed that materials designated as confidential constitute documents that are of a proprietary and/or personal nature.
6. An appropriate Order is attached.

WHEREFORE, Defendant St. Mary's requests leave of Court to file these confidential materials under seal.

Respectfully submitted,
CLARK HILL PLC

/s/ Jeffrey A. Steele

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Dated: October 21, 2011

CERTIFICATE OF SERVICE

I hereby certify that on October 21, 2011, I served *Motion For Leave To File Confidential Appendix Materials Under Seal* and this *Certificate of Service* upon: James B. Lieber; Thomas Wurst, Theresa Kelley, Stephen Drew and Cathrine Wenger via U.S. Mail and email.

Respectfully submitted,
CLARK HILL PLC

/s/ Jeffrey A. Steele

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